

Resolution No. 4

Date: 10/12/2013

City: Colorado Springs, CO

NAHB Resolution

Title: Water Quality Trading
Sponsor: Environmental Issues Committee
Submitted by: Chuck Ellison

WHEREAS, when waterbodies fail to meet their expected water quality goals the Clean Water Act requires actions be taken to restore and improve their water quality;

WHEREAS, new Total Maximum Daily Loads (TMDLs) for phosphorus, sediment, and nutrients, such as the Chesapeake Bay TMDL, are expected to require more pollutant reductions from the residential construction sector;

WHEREAS, compliance with future stormwater requirements are expected to become more difficult and expensive for developers and home builders due to future national mandates and ever more stringent state and local stormwater requirements;

WHEREAS, water quality trading provides an efficient and cost effective means of reducing pollutant loads by more than 25 percent;

WHEREAS, the Environmental Protection Agency (EPA) adopted a water quality trading policy in 2003 and has endorsed the concept of water quality trading as a “market-based approach with the potential to provide greater flexibility than traditional regulatory processes while potentially achieving water quality goals at substantial economic savings;”

WHEREAS, states, local governments, Municipal Separate Storm Sewer Systems (MS4s), watersheds and other permitting authorities can establish water quality trading programs to meet Clean Water Act requirements; and

WHEREAS, participating in water quality trading is voluntary and can save money for home builders, where state trading programs exist,

NOW, THEREFORE, BE IT RESOLVED that the National Association of Home Builders (NAHB) support water quality trading as a voluntary, alternative method for home builders and developers to achieve compliance with their permit requirements, assist in meeting environmental goals, and lower the costs of meeting new stormwater/wastewater requirements.

BE IT FURTHER RESOLVED that NAHB support state trading programs that:

1. Allow trading between point sources, such as National Pollutant Discharge Elimination System (NPDES) permit-holders, and nonpoint sources, such as agricultural uses, as well as other types of trading.
2. Encompass trading for nitrogen, phosphorus, and sediment credits, collectively or separately, where reductions in such pollutants are mandated.
3. Allow the trade of credits across state and other political boundaries and across water basins, wherever feasible.
4. Allow construction NPDES permit-holders to go beyond their permitted stormwater and wastewater requirements and thus generate credits to sell on the trading market.

Board of Directors Action:

Executive Board Action:

Resolutions Committee Action:

Land Development Committee Action:

State and Local Government Affairs Committee Action:

Federal Government Affairs Committee Action:

Environmental Issues Committee Action:

Approved

Recommends Approval

Recommends Approval

Recommends Approval

Recommends Approval

Recommends Approval

Recommends Approval